

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

C.D., D.D., D.B., and By And Through Next)	
Of Friend, DEBORAH DIXON,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
FIRST CASH, INC., and)	Cause No.:
THOMPSON RCA, INC.,)	
)	
Defendants.)	
)	
)	

NOTICE OF REMOVAL

COMES NOW Defendant, Thomson Inc., improperly named herein as Thompson RCA, Inc., by and through its attorneys, Sandberg, Phoenix & von Gontard, P.C., and pursuant to 28 U.S.C. § 1332, and Rule 81(c) of the Federal Rules of Civil Procedure, and for Notice of Removal, states as follows:

1. A civil action was commenced on or about January 24, 2007, in the Circuit Court of the County of St. Louis, State of Missouri, by plaintiff, Deborah Dixon (hereinafter referred to as "Plaintiffs"), As Next Friend for C.D., D.D., and D.B., against defendants, First Cash, Inc., and Thomson Inc., improperly named herein as Thompson RCA, Inc. Said action was assigned Cause Number 07CC-000292.

2. Plaintiffs filed a two count petition alleging the wrongful death of A.D. Attached hereto are copies of entire state court file that have been connected with this suit.

3. Plaintiffs are residents of the State of Missouri. Defendant Thomson Inc., improperly named herein as Thompson RCA, Inc., is not and was not at the time of commencement of this action, a citizen of the State of Missouri. Instead, Defendant Thomson Inc., improperly named herein as Thompson RCA, Inc., is and was at the time of commencement of this action, a corporation incorporated and organized under the laws of Delaware, with its principal place of business in the State of Indiana.

4. Defendant First Cash, Inc. is not and was not at the time of commencement of this action, a citizen of the State of Missouri. Instead, Defendant First Cash, Inc. is and was at the time of commencement of this action, a corporation incorporated and organized under the laws of Delaware, with its principal place of business in the State of Texas.

5. Removal of this cause to this Court is sought pursuant to the provisions of 28 U.S.C. § 1441, and the time for filing this Notice of Removal as set forth in 28 U.S.C. § 1446 has not expired.

6. Defendant, Thomson Inc., improperly named herein as Thompson RCA, Inc., has yet to be served but first received a copy of the filed petition on or about January 25, 2007.

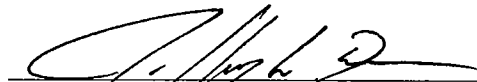
7. Plaintiffs allege the wrongful death of their brother and thus, the amount in controversy exceeds the jurisdictional amount for federal jurisdiction. Therefore, this Court has jurisdiction over this case pursuant to 28 U.S.C. § 1332.

8. Contemporaneous with the filing of this Notice of Removal, Defendant, Thomson Inc., improperly named herein as Thompson RCA, Inc., will give written notice thereof to plaintiffs and file a copy of the Notice of Removal with the Clerk of the Circuit Court of the County of St. Louis, State of Missouri, and provide this Court with a Proof of Filing in state court.

WHEREFORE, Defendant, Thomson Inc., improperly named herein as Thompson RCA, Inc., prays that the above-captioned action now pending against it in the Circuit Court of St. Louis County, State of Missouri, be removed to the United States District Court for the Eastern District of Missouri, Eastern Division.

SANDBERG, PHOENIX & von GONTARD, P.C.

By:



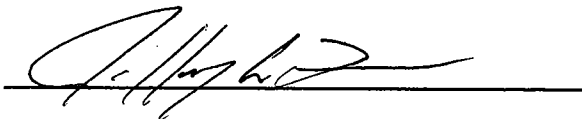
Peter von Gontard, #4614
Jeffrey L. Dunn, #104223
One City Centre, 15th Floor
St. Louis, MO 63101-1880
314-231-3332
314-241-7604 (Fax)
E-mail: pvongontard@spvg.com
jdunn@spvg.com

Attorneys for Defendant Thomson Inc., improperly
named herein as Thompson RCA, Inc.

Certificate of Service

I hereby certify that on 2/14/, 2007, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Anthony S. Bruning
Leritz, Plunkert & Bruning
One City Centre, Suite 2001
St. Louis, MO 63101
abruning@leritzlaw.com
Attorney for Plaintiffs



IN THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI

DIXON, [REDACTED] ETAL

07CC-000292 M CV

PLAINTIFF

CASE NUMBER

VS

FIRST CASH INC ETAL

DEFENDANT

S U M M O N S

THE STATE OF MISSOURI TO: DEFENDANT (1)

FIRST CASH INC
CT CORPORATION - SRV
120 SOUTH CENTRAL AVENUE
CLAYTON MO 63105

YOU ARE HEREBY SUMMONED TO APPEAR BEFORE THE ABOVE-NAMED COURT AND TO FILE YOUR PLEADING TO THE PETITION, A COPY OF WHICH IS ATTACHED HERETO, AND TO SERVE A COPY OF YOUR PLEADING UPON THE ATTORNEY OR PARTY WHOSE NAME AND ADDRESS IS LISTED BELOW: ALL WITHIN 30 DAYS AFTER SERVICE OF THIS SUMMONS UPON YOU, EXCLUSIVE OF THE DAY OF SERVICE. IF YOU FAIL TO DO SO, JUDGMENT OF DEFAULT WILL BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE PETITION.

DATE ISSUED: JANUARY 30, 2007

ATTORNEY:

ANTHONY S BRUNING
LERITZ, PLUNKERT & BRUNING, P C
ONE CITY CENTRE STE 2001
ST LOUIS MO 63101
(314) 231-9600



JOAN M. GILMER, Circuit Clerk

By Janet Gallo
Deputy Clerk (JG)

SPECIAL NEEDS: If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314/615-8029, FAX 314/615-8739, or TTY at 314/615-4567, at least three business days in advance of the court proceeding.

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI

DIXON, [REDACTED] ETAL

07CC-000292 M CV

PLAINTIFF

CASE NUMBER

VS

FIRST CASH INC ETAL

DEFENDANT

S U M M O N S

THE STATE OF MISSOURI TO: DEFENDANT (2)

THOMPSON RCA INC
CT CORPORATION - SRV
120 SOUTH CENTRAL AVE
CLAYTON MO 63105

YOU ARE HEREBY SUMMONED TO APPEAR BEFORE THE ABOVE-NAMED COURT AND TO FILE YOUR PLEADING TO THE PETITION, A COPY OF WHICH IS ATTACHED HERETO, AND TO SERVE A COPY OF YOUR PLEADING UPON THE ATTORNEY OR PARTY WHOSE NAME AND ADDRESS IS LISTED BELOW: ALL WITHIN 30 DAYS AFTER SERVICE OF THIS SUMMONS UPON YOU, EXCLUSIVE OF THE DAY OF SERVICE. IF YOU FAIL TO DO SO, JUDGMENT OF DEFAULT WILL BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE PETITION.

DATE ISSUED: JANUARY 30, 2007

ATTORNEY:

ANTHONY S BRUNING
LERITZ, PLUNKERT & BRUNING, P C
ONE CITY CENTRE STE 2001
ST LOUIS MO 63101
(314) 231-9600



JOAN M. GILMER, Circuit Clerk

By Janet Hallo
Deputy Clerk

SPECIAL NEEDS: If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314/615-8029, FAX 314/615-8739, or TTY at 314/615-4567, at least three business days in advance of the court proceeding.

IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

C [REDACTED] D [REDACTED] D [REDACTED])
D [REDACTED] and D [REDACTED] B [REDACTED],)
By and through Next of Friend,)
DEBORAH DIXON,)
)
Plaintiffs,)
)
vs.)
)
FIRST CASH, INC., and)
THOMPSON RCA, INC.,)
)
Defendants.)

Cause No.:

Division:

19

07CC-000292

2007 JAN 24 AM 11:52

RECEIVED
ST. LOUIS
COURT

ORDER FOR APPOINTMENT OF NEXT OF FRIEND

Petition for Appointment of Next of Friend is granted. Deborah Dixon is hereby appointed Next of Friend of C [REDACTED] D [REDACTED] D [REDACTED] and D [REDACTED] B [REDACTED] for the purpose of instituting suit for the claim arising out of the fire and explosion of February 27, 2004 as set forth in the Petition for Appointment of Next of Friend.

SO ORDERED: _____

Dated: _____

[Signature]
1/25/07

IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

C [REDACTED] D [REDACTED] D [REDACTED])
D [REDACTED] and D [REDACTED] B [REDACTED],)
By and through Next of Friend,)
DEBORAH DIXON,)
)
Plaintiffs,)
)
vs.)
)
FIRST CASH, INC., and)
THOMPSON RCA, INC.,)
)
Defendants.)

Cause No.:

Division:

19

07CC-000292

2007 JAN 24 AM 11:5

ORDER FOR APPOINTMENT OF NEXT OF FRIEND

Petition for Appointment of Next of Friend is granted. Deborah Dixon is hereby appointed Next of Friend of C [REDACTED] D [REDACTED] E [REDACTED] D [REDACTED] and D [REDACTED] B [REDACTED] for the purpose of instituting suit for the claim arising out of the fire and explosion of February 27, 2004 as set forth in the Petition for Appointment of Next of Friend.

SO ORDERED: 

Dated: 1/25/07

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

07CC-000292

C [REDACTED] D [REDACTED] D [REDACTED])
D [REDACTED] and D [REDACTED] B [REDACTED])
By and through Next of Friend,)
DEBORAH DIXON,)

Cause No.:

Plaintiffs,)

Division:)

vs.)

FIRST CASH, INC., and)
THOMPSON RCA, INC.,)

Defendants.)

19/

2007 JAN 24 AM 10:52

FILED
ST. LOUIS COUNTY
MISSOURI

PETITION FOR APPOINTMENT OF NEXT OF FRIEND

COMES NOW Deborah Dixon, by and through counsel, and petitions this Court to appoint her as Next of Friend for C [REDACTED] D [REDACTED] D [REDACTED] D [REDACTED] and D [REDACTED] B [REDACTED]. In support of her Petition, the following is offered:

1. On or about February 27, 2004, a fire and explosion occurred at 10422 Canfield, St. Louis County, State of Missouri, as a result of a defective television, which caused the death of A [REDACTED] D [REDACTED]

2. Christina Dixon, the only surviving and known parent of A [REDACTED] D [REDACTED], is deceased.

3. Deborah Dixon has acted as guardian to Plaintiffs, C█████████ D█████████, D█████████ D█████████ and D█████████ B█████████ as their mother, Christina Dixon, is deceased and their father is unknown.

4. A█████████ D█████████, age 5, and son of Christina Dixon, is survived by two brothers and a sister, C█████████ D█████████ (age 13), D█████████ D█████████ (age 11) and D█████████ B█████████ (age 10).

5. Pursuant to § 537.080 of the Revised Statutes of Missouri, C█████████ D█████████, D█████████ D█████████ D█████████ and D█████████ B█████████ as the surviving brothers and sister of the decedent, are entitled to bring a cause of action for A█████████ D█████████'s wrongful death.

6. C█████████ D█████████, D█████████ D█████████ and D█████████ B█████████ are minors and incapable of instituting a lawsuit or properly caring for their interests in any litigation brought by them.

7. It is proper for the protection of C█████████ D█████████, D█████████ D█████████ and D█████████ B█████████, for the Court to appoint Deborah Dixon as Next of Friend of C█████████ D█████████, D█████████ D█████████ and D█████████ B█████████ for the litigation for the wrongful death claim of their brother, A█████████ D█████████.

WHEREFORE, Deborah Dixon prays for an order appointing her Next of Friend of C█████████ D█████████, D█████████ D█████████ and D█████████ B█████████ for the purpose of litigating their claim for the wrongful death of their brother, A█████████ D█████████.

Respectfully Submitted,

LERITZ, PLUNKERT & BRUNING, P.C.

By:

A handwritten signature in black ink, appearing to read "Anthony S. Bruning", is written over a horizontal line.

ANTHONY S. BRUNING, # 30906

CHRISTOPHER E. McGRAUGH #36301

Attorneys for Plaintiffs

One City Centre, Suite 2001

St. Louis, Missouri 63101

Telephone: (314) 231-9600

Facsimile: (314) 231-9480

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

C [REDACTED] D [REDACTED], D [REDACTED])
D [REDACTED] and D [REDACTED] B [REDACTED])
By and through Next of Friend,)
DEBORAH DIXON,)
)
Plaintiffs,)
)
vs.)
)
FIRST CASH, INC., and)
THOMPSON RCA, INC.,)
)
Defendants.)

Cause No.:

Division:

19

07CC-000292

2007 JAN 24 AM 10:37

CLERK

RECEIVED
CIRCUIT COURT
ST. LOUIS COUNTY
JAN 24 2007

PETITION FOR APPOINTMENT OF NEXT OF FRIEND

COMES NOW Deborah Dixon, by and through counsel, and petitions this Court to appoint her as Next of Friend for C [REDACTED] D [REDACTED] D [REDACTED] D [REDACTED] and D [REDACTED] B [REDACTED]. In support of her Petition, the following is offered:

1. On or about February 27, 2004, a fire and explosion occurred at 10422 Canfield, St. Louis County, State of Missouri, as a result of a defective television, which caused the death of A [REDACTED] D [REDACTED].
2. Christina Dixon, the only surviving and known parent of A [REDACTED] D [REDACTED], is deceased.

3. Deborah Dixon has acted as guardian to Plaintiffs, C██████ D██████, D██████ D██████ and D██████ B██████ as their mother, Christina Dixon, is deceased and their father is unknown.

4. A██████ D██████, age 5, and son of Christina Dixon, is survived by two brothers and a sister, C██████ D██████ (age 13), D██████ D██████ (age 11) and D██████ B██████ (age 10).

5. Pursuant to § 537.080 of the Revised Statutes of Missouri, C██████ D██████, D██████ D██████ and D██████ B██████, as the surviving brothers and sister of the decedent, are entitled to bring a cause of action for A██████ D██████'s wrongful death.

6. C██████ D██████, D██████ D██████ and D██████ B██████, are minors and incapable of instituting a lawsuit or properly caring for their interests in any litigation brought by them.

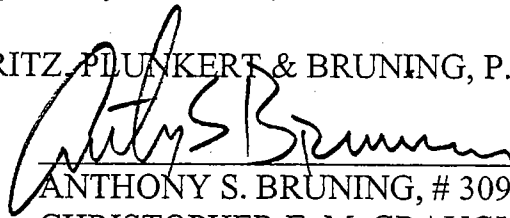
7. It is proper for the protection of C██████ D██████, D██████ D██████ and D██████ B██████, for the Court to appoint Deborah Dixon as Next of Friend of C██████ D██████, D██████ D██████ and D██████ B██████ for the litigation for the wrongful death claim of their brother, A██████ D██████.

WHEREFORE, Deborah Dixon prays for an order appointing her Next of Friend of C██████ D██████, D██████ D██████ and D██████ B██████ for the purpose of litigating their claim for the wrongful death of their brother, A██████ D██████.

Respectfully Submitted,

LERITZ, PLUNKERT & BRUNING, P.C.

By:

A handwritten signature in black ink, appearing to read "Anthony S. Bruning", is written over a horizontal line.

ANTHONY S. BRUNING, # 30906

CHRISTOPHER E. McGRAUGH #36301

Attorneys for Plaintiffs

One City Centre, Suite 2001

St. Louis, Missouri 63101

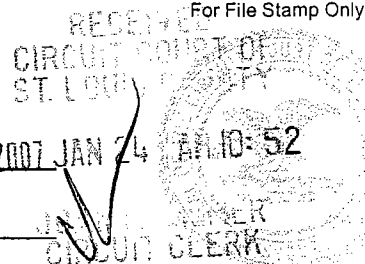
Telephone: (314) 231-9600

Facsimile: (314) 231-9480

In the CIRCUIT COURT of St. Louis County, Missouri



For File Stamp Only



07CC-000295

Case Number

Division

This Circuit Civil/Equity Cover Sheet and the information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form is required by the Clerk of this Court for the purpose of initiating case processing. (See instructions below.)

Circuit Civil/Equity Cover Sheet

19

1. PLAINTIFF(S) C [REDACTED] D [REDACTED], D [REDACTED] D [REDACTED] and D [REDACTED] B [REDACTED], by and through Next of Friend DEBORAH DIXON First Plaintiff's: (b) Address _____ Telephone _____ (c) Attorney <u>Anthony S. Bruning</u> Bar # <u>30906</u> Firm <u>Leritz, Plunkert & Bruning, P.C.</u> Address <u>One City Centre, Suite 2001, St. Louis, MO 63101</u> Telephone <u>(314) 231-9600</u> Fax # <u>(314) 231-9480</u>	DEFENDANT(S) FIRST CASH, INC. and THOMPSON RCA, INC. First Defendant's: (b) Address <u>CT Corporation, 120 South Central Ave.,</u> <u>Clayton, MO 63105</u> Telephone _____ (c) Attorney _____ Bar # _____ Firm _____ Address _____ Telephone _____ Fax # _____
---	--

2. NATURE OF ACTION CODE (PLACE AN "X" IN ONLY ONE BOX)

CIVIL		EQUITY	
<input type="radio"/> 10100 PERSONAL INJURY VEHICULAR	<input type="radio"/> 40210 EMINENT DOMAIN - COUNTY	<input type="radio"/> 31900 OTHER ADMINISTRATIVE REVIEW	<input type="radio"/> 50300 DECLARATORY JUDGMENT
<input type="radio"/> 10200 PERSONAL INJURY PRODUCT LIA.	<input type="radio"/> 40220 EMINENT DOMAIN - OTHER	<input type="radio"/> 41900 OTHER REAL ESTATE	<input type="radio"/> 51900 OTHER EXTRAORDINARY REMEDY
<input type="radio"/> 10300 PERSONAL INJURY MALPRACTICE	<input type="radio"/> 40230 EXCEPTION	<input type="radio"/> 41910 FORECLOSURE	<input type="radio"/> 51910 PROHIBITION
<input type="radio"/> 11000 PERSONAL INJURY OTHER	<input type="radio"/> 70100 REG OF FOREIGN JUDGMENT-CV	<input type="radio"/> 41920 QUIET TITLE	<input type="radio"/> 70600 EXPUNGEMENT- ARREST RECORD
<input type="radio"/> 11000 PROPERTY DAMAGE	<input type="radio"/> 70200 TAX ACTION	<input type="radio"/> 41930 EJECTMENT	<input type="radio"/> 71910 FORFEITURE
<input checked="" type="radio"/> 11100 WRONGFUL DEATH	<input type="radio"/> 70400 SMALL CLAIMS TRIAL DE NOVO	<input type="radio"/> 41940 PARTITION	<input type="radio"/> 71915 INTERNAL AFFAIRS
<input type="radio"/> 11900 TORT - OTHER	<input type="radio"/> 70500 POST-CONV RELIEF-RULE 24.035	<input type="radio"/> 50100 HABEAS CORPUS	<input type="radio"/> 71930 SPECIFIC PERFORMANCE
<input type="radio"/> 11910 INTENTIONAL TORT	<input type="radio"/> 70505 POST-CONV RELIEF-RULE 29.15	<input type="radio"/> 50120 MANDAMUS	<input type="radio"/> 71940 MISC - EQ
<input type="radio"/> 20100 SUIT ON CONTRACT	<input type="radio"/> 71900 MISC. - CV	<input type="radio"/> 50200 INJUNCTION	<input type="radio"/> 71950 WRIT OF CERTIORARI
<input type="radio"/> 20101 AGREEMENT	<input type="radio"/> 71920 REPLEVIN	<input type="radio"/> 50210 TEMPORARY RESTRAINING ORDER	<input type="radio"/> 71977 MISC EQ-STUDENT TRIAL DE NOVO
<input type="radio"/> 20105 ACCOUNT	<input type="radio"/> 71925 WILL CONTEST		
<input type="radio"/> 20110 NOTE	<input type="radio"/> 71935 PROB FORMAL DECREE		
<input type="radio"/> 40100 SUIT- ENFORCE MECHANIC'S LIEN	<input type="radio"/> 71971 TRIAL DE NOVO FROM ASSOC DIV		
<input type="radio"/> 40200 EMINENT DOMAIN - STATE	<input type="radio"/> 71999 MISC CV SUBPOENA/FOREIGN JUR		

Signature of Person Filing: Anthony S. Bruning

Instructions for Completing Circuit Civil/Equity Cover Sheet

As part of our reporting requirements to the Missouri Supreme Court and the Office of the State Courts Administrator you are required to complete and submit this Circuit Civil/Equity Cover Sheet at the time you file your cause of action. Your cause of action will not be accepted and/or processed unless it is accompanied by this Circuit Civil/Equity Cover Sheet at the time of filing. The person, or attorney, filing the cause of action should complete the form as follows:

1. Plaintiff(s)/Defendant(s): Enter the names (last, first, middle initial) of plaintiff(s) and defendant(s). If the plaintiff or defendant is a:

Corporation - Include the name of the registered agent or corporate officer.

Government Agency - Use only the full name or standard abbreviations.

Government Official - Identify the Agency and then the official, giving both title and name.

If all the parties' names cannot fit on this form, list them on an attachment, noting in this section "see attachment."

(b) Address Enter the address, telephone number, of the first plaintiff and defendant, include zip code.

(c) Attorneys Enter the firm name, address, zip code, telephone & fax number, and bar number(s) of the attorney(s) of record. If there are several attorneys, list them on an attachment, noting in this section "see attachment."

2. Nature of Action. Place an "x" in the one appropriate box which corresponds to the type of action you are filing.

3. **NOTE: If there are multiple counts in the petition that are considered both Civil and Equity, it is the responsibility of the filing party to choose the one appropriate nature of action. The assignment of the case is subject to review by the Presiding Judge. Based on a review, the case may be reassigned.**

IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

C [REDACTED] D [REDACTED], D [REDACTED]
D [REDACTED] and D [REDACTED] B [REDACTED],
By and through Next of Friend,
DEBORAH DIXON,

Plaintiffs,

vs.

FIRST CASH, INC.,

Serve at:
CT Corporation
120 South Central Ave.
Clayton, MO 63105

and

THOMPSON RCA, INC.,

Serve at:
Ct Corporation
120 South Central Ave.
Clayton, MO 63105

Defendants.

Cause No:

Division:

19

07CC-000292

2007 JAN 24 AM 10:52

CLERK

JURY TRIAL DEMANDED

PETITION FOR WRONGFUL DEATH

COME NOW Plaintiffs, by and through their Next of Friend, Deborah Dixon, and
for her cause of action against Defendants, states:

ALLEGATIONS COMMON TO ALL COUNTS

1. Deborah Dixon is a citizen and resident of the City of St. Louis, State of
Missouri.

2. Defendant First Cash, Inc. is a foreign corporation doing business in the State of Missouri as a seller of televisions and electronics, among other things.

3. Thompson RCA is a foreign corporation doing business in the State of Missouri as a manufacturer and seller of televisions.

4. On or about February 24, 2004, a fire occurred at 10422 Canfield, St. Louis County, State of Missouri, causing the death of A [REDACTED] D [REDACTED].

5. Christina Dixon was the mother of A [REDACTED] D [REDACTED] and is now deceased.

6. A [REDACTED] D [REDACTED] had no father.

7. C [REDACTED] D [REDACTED], D [REDACTED] D [REDACTED] and D [REDACTED] B [REDACTED] are the surviving brothers and sisters of A [REDACTED] D [REDACTED].

8. There being no spouse or children, father or mother of A [REDACTED] D [REDACTED], the brothers and sister of A [REDACTED] D [REDACTED]; C [REDACTED] D [REDACTED], D [REDACTED] D [REDACTED] and D [REDACTED] B [REDACTED] may bring this action pursuant to R.S.Mo. §537.080.

COUNT I

COME NOW Plaintiffs, by and through their Next of Friend, Deborah Dixon, and by and through their attorneys, and for Count I of their cause of action against Defendant Thompson RCA, Inc., state as follows:

9. Plaintiffs reassert and reallege the allegations contained in Paragraphs 1 through 11 as set out above as if fully set forth herein.

10. On or about September 13, 2003, Christina Dixon and Ralph Bland purchased an RCA Television from Defendant First Cash, Inc. at 7751 North Lindbergh

Boulevard, Hazelwood, Missouri, which was manufactured and sold by Defendant Thompson RCA.

11. The aforementioned fire and resulting death was a direct and proximate result of a defective and unreasonably dangerous television which was sold to Christina Dixon and Ralph Bland.

12. The television was defective and unreasonably dangerous at the time of the sale when used in a manner reasonably anticipated.

13. Plaintiffs C [REDACTED] D [REDACTED], D [REDACTED] D [REDACTED] and D [REDACTED] B [REDACTED] lost the services, support and companionship of their brother, A [REDACTED] D [REDACTED], as set forth fully in the Missouri Wrongful Death Statute.

WHEREFORE, Plaintiffs pray for damages and judgment against Defendant Thompson RCA, Inc. in an amount that is fair, just and reasonable and their costs incurred herein.

COUNT II

COME NOW Plaintiffs, by and through their Next of Friend, Deborah Dixon, and by and through their attorneys, and for Count II of their cause of action against Defendant First Cash, Inc., state as follows:

14. Plaintiffs reassert and reallege the allegations contained in Paragraphs 1 through 16 as set out above as if fully set forth herein.

15. On or about September 19, 2003, Christina Dixon and Ralph Bland purchased an RCA Television from Defendant First Cash, Inc. at 7751 North Lindbergh Boulevard, Hazelwood, Missouri.

16. Defendant First Cash, Inc. modified, altered and repackaged the television for resale to Christina Dixon and Ralph Bland.

17. The aforementioned fire and resulting death were the direct and proximate result of the defective and unreasonable condition of the television which was sold to Christina Dixon and Ralph Bland by Defendant First Cash, Inc.

18. The aforementioned television was defective and reasonably dangerous at the time of the sale when used in a manner reasonably anticipated.

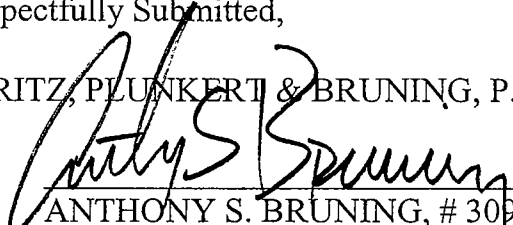
19. C [REDACTED], D [REDACTED], D [REDACTED] and D [REDACTED] B [REDACTED] have lost the services, support, and companionship of their brother, A [REDACTED] D [REDACTED] as fully set in the Missouri Wrongful Death Statute.

WHEREFORE, Plaintiffs pray for damages and judgment against Defendant First Cash, Inc. in an amount that is fair, just and reasonable and their costs incurred herein.

Respectfully Submitted,

LERITZ, PLUNKERT & BRUNING, P.C.

By:



ANTHONY S. BRUNING, # 30906
CHRISTOPHER E. McGRAUGH # 36301
Attorneys for Plaintiffs

One City Centre, Suite 2001

St. Louis, Missouri 63101

Telephone: (314) 231-9600

Facsimile: (314) 231-9480

I certify and attest that the above is a true copy of the original record of the Court in case number 07CC 292 as it appears on file in my office.

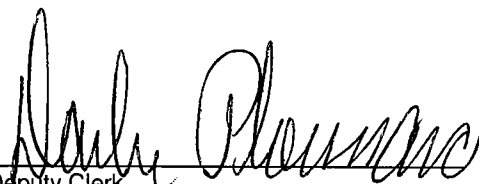


Issued

1-31-07

JOAN M. GILMER, Circuit Clerk
St. Louis County Circuit Court

By


Deputy Clerk